

	Comment Type	Total
1	Proposal is too burdensome	18
2	Burden is understated	7
3	Additional burden may impact service	12
4	Reporting for 5310 should be at designated recipient, not subrecipient, level	9
5	Limit (or eliminate) 5310 reporting	8
6	Limit 5311 Reporting	10
7	Remove 5310 performance targets	4
8	Assets should be reported only if \$50K or above	10
9	Inventory should not include contractor assets	14
10	Equipment should not be reported	10
11	Implementation should be postponed	9
12	Requirements should be consistent with TERM	3
13	Assets reported into NTD should not necessarily be subject to TAM requirements	5
14	Allow for bulk upload	5
15	Collaborate with industry to develop requirements	2
	Total	126

Respondent Type	Total
Government Body (State DOT)	10
Transit Provider	10
Association/Union/Trade	2
Regional Planning Association	1
Unique Respondents	23

#	Organization	Organization Type	Last Name	First Name	Title	Comment Types
4	LA Metro	Transit Provider	Longley	Denise	Deputy Executive Officer, Enterprise Transit Asset Management	
7	SFMTA	Transit Provider	Reiskin	Edward	Director of Transportation	
8	SEPTA	Transit Provider				
10	SamTrans	Transit Provider	Harvey	Chuck	Deputy CEO	Possible Duplicate
12	AC Transit	Transit Provider	Hursh	Michael	General Manager	
14	Caltrans DRMT	Transit Provider	Travis	Brian		

16	MTA	Transit Provider	Cummings	Crystal	Deputy Director, Federal Affairs and Emergency Relief Funding	
17	Caltrain	Transit Provider	Harvey	Chuck	Deputy CEO	Possible Duplicate
19	Valley Transportation Authority	Transit Provider	Rensi	Marcella	Transportation Planning Manager	
20	Metrolink	Transit Provider	Leahy	Arthur	Chief Executive Officer	

Comment Overview	Proposal is too burdensome	Burden is understated	Additional burden may impact service	Reporting for 5310 should be at designated recipient, not subrecipient, level	Limit (or eliminate) 5310 reporting
<p>Endorses the comments made by APTA. FTA should re-sequence the requirement of setting TAM performance goals to be later than the requirement for approval of useful life benchmarks in the NTD. Timing of reporting into the NTD conflicts with the 3 month window for reporting targets in the TAM rule. The 3 month window is too short; should be extended to 6-12 months.</p>	X				
<p>FTA should clearly specify if all assets used in the provision of public transportation are required to be reported to the NTD. FTA should define a minimum value for assets to be reported, such as \$10K. Recommends that the definition point to GASB for establishing a threshold. Add an optional asset ID field to forms separate from the 'notes' field. Asset Inventory should be consistent with TERM to avoid duplicating work. All for bulk uploads. Clarify passenger facility reporting requirements. Define facility square footage. Facility condition assessment should be consistent with the TERM scale. Recommends adding asset value for all assets.</p>					
<p>Implementation should occur in the 2017 reporting cycle. Recommends simplifying the A-50 form to include only 4 categories of guideway. Recommends adding "custom special work" to the A-55 to allow all assets to be reported.</p>					
<p>NTD reporting requirements should align with TAM plan development requirement - 2 years after the final TAM rule. Reporting burden is underestimated, especially for large agencies. Diverting resources to create a TAM plan and performance metrics may impact service. Requests that FTA refine estimates and identify a source of funding for compliance. New NTD reporting system lengthen the time it took to report. FTA should ensure the system is working properly. Leased property should not be included in asset reporting.</p>	X	X	X		
<p>Burden is understated. Cost of developing and maintaining the data set required is more than estimated. Condition reporting should be consistent with TERM and more guidance is needed. Data labels and structure should be consistent between TERM and NTD. Requests clarification on the \$10K asset value floor. Requests further guidance on ULBs that are not based on accounting depreciation standards. Provide bulk upload/better data input usability.</p>	X	X			
<p>Supports AASHTO's comments. Limit data requests for 5310 and 5311 recipients. Approach at the recipient level. Only assets above \$50K. No additional reporting burden for 5339 recipients. Do not include assets less than \$50K, ULB less than 5 yrs, 5310 performance measures, 5310 financial or service data. Do not include condition assessments for contractor assets.</p>	X		X	X	X

<p>Administrative and cost burden is vastly understated. Updating MTA's inventory for 20 yrs needs assessment takes 9-12 months. This assessment is updated ever 5 years. More frequent updating is not necessary. Burden estimate does not take into account additional staff to comply with FTA requirements. FTA should collaborate with the industry to develop more useful data. Recommends using the HERS sampling approach. Particularly concerned with replacement cost requirements and needs additional clarity on reporting performance restrictions. Defer implementation until after final TAM rule. Additional guidance is needed on facility condition reporting. FTA should not be prescriptive in the use of TERM. Requests detail on the availability of a bulk upload feature.</p>	X	X			
<p>NTD reporting requirements should align with TAM plan development requirement - 2 years after the final TAM rule. Reporting burden is underestimated, especially for large agencies. Diverting resources to create a TAM plan and performance metrics may impact service. Requests that FTA refine estimates and identify a source of funding for compliance. New NTD reporting system lengthen the time it took to report. FTA should ensure the system is working properly. Leased property should not be included in asset reporting.</p>	X	X	X		
<p>Condition assessments require considerably more effort than estimated by FTA. It is feasible to provide an annual estimate and an updated condition assessment every 2-3 years following a complete assessment. California requires a complete assessment of rail assets every three years. Available data may not allow for an annual slow zone metric. Additional guidance is needed on the performance measures and targets. It is duplicative and time consuming to double report shared assets. Concur with the decision to remove replacement cost information. Data submission should be streamlined. Requests the ability to upload directly from TERM lite or regional inventory. Exclude 5310 and JARC from reporting. Requests additional clarity on the relationship between the A-50 and A-55. S-20 should be retired. Does not understand why age is not associate with track (only service years when new) as this may impact service restrictions. Requests old facility forms be retired to avoid duplicate reporting.</p>	X	Condition assessment requires considerably more effort than estimated by FTA			Exempt 53X0
<p>Concerned about proposed requirement to expand reporting to assets that are not owned or maintained by SCRRRA. It is not reasonable to report condition assessments or replacement costs for non-owned assets. Non-owned guideway/track should be reported at the summary level similar to the current NTD fixed guideway segments form. Condition assessments should not be required for non-owned passenger facilities. Need clarification on the condition assessment for admin/maintenance facilities. Reporting of service vehicles and condition assessments should be required for contracted service vehicles. A condition based measure should be used for track and guideway rather than a performance metric such as slow zones. FTA should allow flexibility in the performance measures.</p>	Particularly impactful given FRA requirements that already exist				

Limit 5311 Reporting	Remove 5310 performance targets	Assets should be reported only if \$50K or above	Inventory should not include contractor assets	Equipment should not be reported	Implementation should be postponed	Requirements should be consistent with TERM	Assets reported into NTD should not necessarily be subject to TAM requirements	Allow for bulk upload
			X		After TAM rule			
						X		X
					Until FYX7			
			X		Align with the TAM requirements - two years after the final rule			
						X		X
X	X	X	X	X				

Collaborate with industry to develop requirements	Specific Question(s)	Contact Information (if available)	Phone Number	Email
		One Gateway Plaza, Los Angeles, CA 90012-2952	213.922.7294	longleyd@metro.net
		1 South Van Ness Ave, 7th Floor, San Francisco, CA 94103	415.701.4330 (Darton Ito)	darton.ito@sfmta.com
		1234 Market Street, 10th Floor, Philadelphia, PA 19107-3780	215.580.7103 (Laura Zale)	
	Clarify the \$XOK minimum asset reporting. Is this based on original cost, net book value, market value or replacement cost?	1250 San Carlos Ave, P.O. Box 3006, San Carlos, CA 94070-1306	650.508.6228 (April Chan)	ChanA@samtrans.com
	Requests clarification on the \$XOK asset value floor: unit or total? Requests guidance on calculating ULBS that are not based on accounting depreciation standards.	1600 Franklin St, Oakland, CA 94612	510.891.4753	mhursh@actransit.org
		1120 N St, Sacramento, CA 942874	916.654.8655 (Mark Codey)	brian.travis@dot.ca.gov

X		2 Broadway, New York, NY 10004	212.878.7000	
	Clarify the \$X0K minimum asset reporting. Is this based on original cost, net book value, market value or replacement cost?	1250 San Carlos Ave, P.O. Box 3006, San Carlos, CA 94070-1306		
	Requests clarification on the relationship between the A-50 and A-55	3331 North First Street, San Jose, CA 95134-1927	408.321.5555	

#	Organization	Organization Type	Last Name	First Name	Comment Types
2	Individual	Individual	Peplow	Jim	Asset Inventory
10	Metro Link	Transit Provider	DePallo	Michael	Various
11	APTA	Association/Union/Trade	Melaniphy	Michael	Various
15	CalACT	Association/Union/Trade	Montgomery	Jacklyn	Various
19	Anonymous 1	Individual	Anonymous		Asset Inventory
30	Hampton Roads Transit	Transit Provider	Barnaby	Catherine	Various
40	samTrans	Transit Provider	Scanlon	Michael	Various
45	Monteray Salinas Transtit	Transit Provider	Sedoryk	Carl	Various
46	Massachusetts Bay Transportation Authority	Transit Provider	Guptill	Robert	Asset Inventory
47	Central Contra Costa Transit Authority	Transit Provider	Ramacier	Rick	Various
51	Metropolitan Transportation Authority	Transit Provider	Renek	Naomi	Various

54	King County Metro	Transit Provider			Various
58	SEPTA	Transit Provider	Cullison	James	Various
64	Golden Gate Bridge, Highway and Transportation District	Transit Provider	Davenport	David	Various
71	Metropolitan Transportation Commission	Government Body	Richman	Anne	Various
76	Fayetteville Area System of Transit	Transit Provider	Legans	Sheri	Asset Inventory
79	WMATA	Transit Provider	Sullivan	Regina	Various
80	Lane Transit District	Transit Provider	Kilcoyne	Ronald	Various
	Total Comments				

Asset Inventory Comments	K. Expansion of capital asset reporting required by MAP-21	Other Comments	Specific Question(s)
Yes	On the Revenue Vehicle Inventory (A-70), I wanted to see a column that would allow me to enter which vehicles are represented by a particular row. This would be an open cell that would allow us to list the vehicle ID # (our agency one, not the RVI ID).		
Yes	Identified an issue with the ownership structure of their passenger stations (many are owned by the cities where they are located - current language would require the city to report these assets or they would go unreported). Recommends simplifying guideway types and 'special track work'.		
Yes	"The Proposed Capital Asset Reporting Requirements Presuppose the Results of Future Rulemaking and Are Unduly Burdensome." FTA must accommodate existing TAM plans (and allow them to continue) and phase in any new requirements. They should rely on the Oct 2012 Asset Management Guide as the representative consensus view and keep the requirements 'high level'. Finally, third party assets should be differentiated.		
Yes	Expresses concern that these requirements proceed an NPRM and 'substantive' circular. FTA should continue outreach and technical assistance for agencies that do not have the systems or tools in place. Finally, FTA should identify other 'acceptable methodologies for identifying and assessing the condition and useful life of assets'.		Requests information on how to obtain the congressional report the FTA's Office of Civil Rights provides on serving passengers with disabilities.
Yes	Lists questions for consideration. No specific feedback.		
Yes	Seconds an MBTA comment that notes that the proposed categories do not mirror the F-20 form. Suggests that these should be consistent. Cautions that trying to standardize data across all modes may not be appropriate (i.e. form requests odometer reading from ferryboats, which do not have odometers). Finally, expresses concerns re. the ability to obtain information from 3rd party contractors. The assets may not be used exclusively for transit service (which could skew data) and private companies have expressed concerns over losing competitive edge by sharing this data.		
Yes	Felt that the proposed inventory module would 'create an undue burden' to their agency. Also expressed concern over additional reporting requirements after the TAM system is established.		
Yes	Suggests that reporting requirements should be deferred until the rulemaking is complete. They advocate a gradual approach to implementing the requirements.		
Yes	Notes that the proposed categories do not mirror the F-20 form. Expresses that their current SGR database should be able to provide most of the proposed NTD requirements. Seeks clarity on how agencies should calculate facility condition.		
Yes	Restates APTA's concerns and recommendations (verbatim)		
Yes	Expresses concern that the NTD requirements 'dismiss the results of FTA's Asset Inventory Module Pilot Program'. Requests clarification on the intent behind collecting this level of detail and requests that FTA 'more carefully consider the industry recommendations'. Requests that information be requested at a high level and encourages FTA to consider an alternative approach that allows for asset information to be reported in a manner that is not prescriptive. It will be difficult and potentially costly for MTA to put their data into the requested format. MTA also proposes that only assets which are owned or leased by an agency should be included in the data.		

Yes	Metro will be able to provide asset inventory data by 2015 but expresses concern that the rest of the industry is unlikely to be in the same position. They recommend an extension of the deadline to 2016. Express the need for clarification on reporting categories for consistency.		
Yes	Requests an extension to 2016. Expresses concern over square footage requirements (may not correlate to replacement costs and may be difficult to obtain from a legacy system). Suggests terminology changes for guideway and track modules. Also requests and extension to 2017 for guideway data.		
Yes	Expresses that they should be able to provide asset data and 'do not expect the process to be too onerous' given the timeline. Requests flexibility in setting a minimum threshold for asset inclusion (remove items less than \$10K).		
Yes	Requirement should be deferred until after the rulemaking. Final requirements should ensure compatibility and consistency between all FTA systems (i.e. NTD and TERM). Requests a bulk import/export feature be added to NTD.		
Yes	Requests modification of data entry. Additional column in A-30.		
Yes	Suggests that reporting requirements are premature and should wait until after a final asset management rule. WMATA disagrees with FTA's interpretation of MAP-21 and suggests that maintaining an asset inventory through NTD is redundant and unnecessary. Recommends that FTA continue to use sampling to estimate backlog. Finally, feels that the proposed data collection would be overly burdensome.		
Yes	Replacement costs would be too difficult to determine and keep consistent amongst agencies.		
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Contact Information (if available)

None

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